

REMARKS

New independent Claim 52 defines the invention as a radiator arrangement for a vehicle that includes a support including a lower portion. A first radiator is supported on and extends upwardly from the lower portion of the support. A second radiator is supported on and extends upwardly from the lower portion of the support. A third radiator is supported on and extends upwardly from the lower portion of the support. A condenser is supported on and extends upwardly from the lower portion of the support. A fourth radiator is supported on the first radiator, the second radiator, the third radiator, and the condenser such that the lower portion of the support, the first radiator, the second radiator, the third radiator, and the condenser cooperate to define a chamber. Lastly, a fan deflector guide is supported on the bracket externally of the chamber and is adapted to support a fan thereon.

The Liebherr-Werk reference does not show or suggest the claimed radiator arrangement wherein (1) the lower portion of the support, the first radiator, the second radiator, the third radiator, and the condenser cooperate to define a chamber, and (2) a fan deflector guide is supported on the bracket externally of the chamber and is adapted to support a fan thereon. Rather, the Liebherr-Werk reference discloses a chamber that is formed by only three radiators, an air impermeable bottom plate, an air impermeable back plate, and a fan. Thus, it is believed that the claimed invention is clearly patentable over the Liebherr-Werk reference and the other art of record.

Respectfully submitted,



Richard S. MacMillan

Reg. No. 30,085

MacMillan, Sobanski & Todd, LLC
One Maritime Plaza, Fourth Floor
720 Water Street
Toledo, Ohio 43604
(419) 255-5900